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January 30, 2008

BY ELECTRONIC MAIL

The Honorable Richard J. Sullivan, U.S.D.J.
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: Conopco, Inc. v. Travelers Casualty and Surety Co., et al.
Docket No. 07-CV-06085 (RJS)

Dear Judge Sullivan:

This firm represents defendants Travelers Casualty and Surety Company and The Travelers Indemnity Company (collectively, "Travelers") in the above-referenced action and I am in receipt of Plaintiff's January 25, 2008 letter to Your Honor requesting permission to file an early partial summary judgment motion. I am pleased to report that Travelers has now provided the draft settlement documents to Plaintiff's counsel. In addition, counsel for the parties have agreed, subject to Your Honor's approval, to a two-week adjournment for (1) the discovery requests and disclosures that otherwise would be served on February 1, 2008 pursuant to Your Honor's Scheduling Order, and (2) Travelers substantive response to Plaintiff's request for permission to file an early partial summary judgment motion. During that two-week period, the parties will conduct an in-person meeting to work towards a comprehensive settlement.

If Your Honor has any objection to the two-week adjournment, please advise and Travelers will file a substantive response to Plaintiff's pre-motion letter. Of course, If Your Honor requires a conference with counsel, I am available to make the arrangements.

Respectfully,

A handwritten signature in black ink, appearing to read "R. Mauriello, Jr.", written over a horizontal line.

Robert W. Mauriello, Jr.

RWM/ems

cc: Jeffrey L. Schulman, Esq. (by electronic mail)